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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Linda Caldera-Bredeson.

**Plaintiff,**

V.

United States Postal Service; DOES INDIVIDUALS I-X; and ROE LEGAL ENTITIES I-X.

## Defendants.

Case No. 2:21-cv-01620-GMN-NJK

**Stipulation and Order to Extend  
Deadline for Proposed Joint Pretrial  
Order  
(First Request)**

Pursuant to LR IA 6-1 and LR 26-3, the parties request a 60-day extension from May 29, 2023, to July 28, 2023, to file the proposed joint pretrial order, and for the reasons, set forth below. The purpose for the requested extension is the parties' good faith intention to mediate this case.

#### DISCOVERY COMPLETED

Discovery is complete.

## DISCOVERY REMAINING

No discovery remains to be completed.

#### **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

This request for an extension concerns only the proposed joint pretrial order. The parties agreed that it will be beneficial to try to resolve this case through mediation. The mediation is scheduled on July 6, 2023, before the Hon. David Jones (Ret.) at Advanced

1 Resolution Management. The parties received a confirmation of the mediation day today,  
2 which led to the inability to seek this extension at least 21 days before the existing due date  
3 of May 29, 2023, for the joint pretrial order. This request is made in good faith, not for the  
4 purpose of delay.

5 **EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

6 Accordingly, counsel request that the Court approve a 60-day extension, from May  
7 29, 2023, to July 28, 2023, to file the proposed joint pretrial order.

8 This is the first request for an extension of the joint pretrial order, although there were  
9 earlier approved requests for extensions of other discovery deadlines.

10 This request for an extension of time is not sought for any improper purpose including  
11 delay.

12 Respectfully submitted this 10th day of May 2023.

13 VAN LAW FIRM

14 JASON M. FRIERSON  
United States Attorney

15 /s/ Burke Huber  
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21 /s/ R. Thomas Colonna  
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22 **IT IS SO ORDERED:**

23   
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: May 11, 2023